

**IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA
RICHMOND DIVISION**

GOLDEN BETHUNE-HILL, *et al.*,

Plaintiffs,

v.

VIRGINIA STATE BOARD OF ELECTIONS,
et al.,

Defendants.

Civil Action No. 3:14-cv-00852-REP-
GBL-BMK

**CONSENT MOTION TO EXTEND DEADLINE FOR MOTIONS TO COMPEL
REGARDING PRIVILEGE CLAIMS**

Plaintiffs, Defendants, and Intervenor-Defendants (collectively, the “Parties”) have conferred and agree that an extension of the Court-ordered deadline for Motions to Compel arising out of a claim of privilege is appropriate in order to allow the Parties to continue working on narrowing, or even mooted, the issues that may come before the Court. To that end, the Parties request that both the Court’s Initial Pretrial, Scheduling and Discovery Order of March 2, 2015, Dkt. No. 35, and the Court’s Consent Order of March 24, 2015, Dkt. No. 41, be modified as follows:

1. Any motions to compel arising out of a claim of privilege shall be filed no later than **April 13, 2015**; responses shall be filed on **April 21, 2015**, and replies shall be filed on **April 27, 2015**.

Pursuant to the Court’s ECF Policies and Procedures, a consent order reflecting these proposed modifications will be filed with the clerk’s office.

Dated: March 27, 2015

Respectfully submitted,

By: /s/Anthony F. Troy (by JKR with permission)

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CERTIFICATE OF SERVICE

I hereby certify that on this 27th day of March, 2015, I caused the foregoing to be electronically filed with the Clerk of this Court using the CM/ECF system, which will then send a notification of such filing (NEF) to the following:

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